

inspected 6-19-87

GENERATOR CHECKLIST

I. FACILITY IDENTIFICATION

A. Site Name Safety Kleen B. Street (or other identifier) 1445 W. 42nd Street
 C. City Chicago D. State IL E. Zip Code 60609 F. County Name Cook

G. Description of Operations Solvent recovery

H. EPA ID # ILD005450697 0316000053

I. Facility Contact (Name and Phone Number) Mario Romero

II. F-SOLVENT IDENTIFICATION

A.1. Does the facility generate the following wastes?

a. F001 ☒ Yes ☐ No

b. F002 ☒ Yes ☐ No

c. F003 ☒ Yes ☐ No

(i) If the F003 wastestream has been mixed with a solid or a hazardous waste by characteristic does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

(iii) F004 ☐ Yes ☒ No

(iv) F005 ☒ Yes ☐ No

Waste stream is a mixture of F001, F002, F003 and F005.

Sometimes mixture is manifested as D001

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A.

B. National Extensions

1. Is the waste generated by a Small Quantity Generator? ☐ Yes ☒ No

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 ID Number: ILD005450697
 Inspector: Caroline Panico
 Date: _____

- | | Yes | No | Comments |
|---|--------------------------|-------------------------------------|----------|
| 2. Is the waste generated from a RCRA Corrective Action? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 3. Is the waste generated from a CERCLA remedial action | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 4. Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total F001-F005 constituents by weight? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

C. BDAT Concentration Identification

- Did the generator determine the appropriate treatability group (§268.41) of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?
☒ Yes ☐ No
- Does the generator contend that F-solvent wastes met applicable treatability group BDAT concentrations upon generation [§268.7(a)(2)]?
☐ Yes ☒ No

If yes, answer (a) through (c); if no, go to D.

- Does the generator certify BDAT compliance based upon "applied knowledge"?
☐ Yes ☐ No
- If determined by TCLP, provide date of last test, frequency of testing, and obtain test results.

Date _____

Frequency _____

- Are wastes tested using TCLP when a process or wastestream change occurs?
☐ Yes ☒ No

Facility does not contend that wastes meets BDAT concentrations

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ID Number: _____
Inspector: _____
Date: _____

Comments

D. BDAT Management

1. Are restricted wastes managed onsite? ☐ Yes ☒ No

If yes, answer 1(a) and (b); if no, answer 2.

(a) For wastes equal to or exceeding BDAT concentrations, is treatment and/or disposal conducted? ☐ Yes ☐ No

Waste sent to EnviroSystem Petrochem or Hukell Chemical for further treatment.

If yes, TSDF Checklist must be completed.

(b) For wastes less than BDAT concentrations, are test results maintained in the operating record? ☐ Yes ☐ No

2. (a) For wastes handled offsite, if waste is determined to be less than BDAT concentrations, does generator provide the disposal facility certifications that waste meets applicable BDAT standards and any applicable waste analysis data [§268.7(a)(2)]? ☐ Yes ☒ No

Did not determine if BDAT concentrations are met.

Identify land disposal facilities receiving the BDAT certified wastes. _____

Waste stream used as fuel or sent to be treated further.

(b) For wastes handled offsite, if waste is not less than BDAT concentrations, does generator provide [268.7(a)(1)]:

(i) Notice that BDAT treatment is required? ☐ Yes ☒ No

(ii) EPA waste number? ☒ Yes ☐ No

(iii) Applicable treatment standard? ☐ Yes ☒ No

(iv) Manifest number? ☒ Yes ☐ No

(c) Identify offsite treatment facilities _____

EnviroSystem, Petrochem, Hukell Chemical

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Facility Name: _____
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 Inspector: _____
 Date: _____

E. Storage of Restricted Waste

Comments

1. Is restricted waste stored for greater than 90 days?

☒ Yes ☐ No

- (a) If yes, is facility operating under interim status or final permit?

☒ Yes ☐ No

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Are treatment residuals generated from RCRA 264/265 exempt units or processes?

☐ Yes ☒ No

- (a) If yes, list type of treatment unit and processes _____

Residuals from RCRA-exempt treatment units are subject to Land Disposal Restrictions Program. Ascertain whether residuals have been subjected to restriction program requirements.

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Facility Name: _____
 ID Number: _____
 Inspector: _____
 Date: _____

APPENDIX 2

SOLVENT IDENTIFICATION CHECKLIST

Comments

1. Does the facility generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the facility generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the facility generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

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AND DISPOSAL RESTRICTIONS

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 ID Number: _____
 Inspector: _____
 Date: _____

Comments

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

___ Yes ___ No

Sometimes mixture is ignitable but it is not mixed with solid waste. Mixture consists of spent solvents.

4. Does the facility generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
 nitrobenzene

___ Yes ___ No
 ___ Yes ___ No

5. Does the facility generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
 methyl ethyl ketone
 carbon disulfide
 isobutanol
 pyridine
 benzene
 2-ethoxyethanol
 2-nitropropane

___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No
 ___ Yes ___ No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

___ Yes ___ No

Waste generated as a result of recycling spent solvents. Waste is a mixture of solvents which can not be further recycled.

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

___ Yes ___ No

If the answer is yes, list the constituents.

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(c) Diluents? ☐ Yes ☐ No Comments

If the answer is yes, list the constituents.

(d) Extractants? ☐ Yes ☐ No

If the answer is yes, list the constituents.

(e) Fabric scouring? ☐ Yes ☐ No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media? ☐ Yes ☐ No

If the answer is yes, list the constituents.

If the waste is a mixture of constituents as determined in questions 1-6, answer question 7 to determine whether it is a "solvent mixture" covered by the listings.

7. If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride
 2% trichloroethylene
 25% 1,1,1-trichloroethane
 68% mineral spirits
 100%

If the wastestream is mixed and contains a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

Waste stream is a mixture of F001, F002, F003 and F005. Waste is analyzed prior to shipment off site. Waste number is assigned according to which spent solvent in the mixture is predominant. If the resultant mixture is ignitable, mixture is manifested as F001.

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AND DISPOSAL RESTRICTIONS

Facility Name: _____
 ID Number: _____
 Inspector: _____
 Date: _____

33% acetone
 16% methanol
 51% ethyl ether
 100%

Comments

If the wastestream is mixed and contains F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50% xylene F003
 12% TCE F001
 38% mineral spirits
 100%

If questions 1-7 led the inspector to believe the waste may be an F-solvent or an F-solvent mixture, answer question 8.

8. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer fit for use without being regenerated, reclaimed, or otherwise reprocessed.

___ Yes ___ No

If yes to any of the questions in 1-8, the constituents in this process are considered solvent in the common sense of the word as used by chemists and chemical engineers. Refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

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TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Site Name Safety Kleen B. Street (or other identifier) 1445 W. 42nd Street
 C. City Chicago D. State IL E. Zip Code 60609 F. County Name Cook
 G. Description of Operations Solvent recovery
 H. EPA ID # ILD005450697 0316000053

I. Facility Contact (Name and Phone Number)

II.A. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements (§264.13 or 265.13)?

☐ Yes ☐ No

2. Does facility obtain chemical and physical analysis of waste?

☒ Yes ☐ No

(a) Does testing include analyses for all F001-F005 constituents?

☒ Yes ☐ No

(b) Are analyses performed using TCLP?

☐ Yes ☐ No

(c) Are analyses conducted onsite or offsite (identify offsite lab)?

☒ On ☐ Off onsite labs

(d) Describe frequency of sampling

Every shipment of waste off site

is analyzed

(e) Describe procedures used to identify manifest discrepancies

3. Does the facility maintain the certification of BDAT compliance from generators and/or treaters (§268.7(c))?

☐ Yes ☒ No

All waste accepted from off site is spent solvent which was Safety Kleen product.

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TSD

Facility: _____
ID Number: _____
Inspector: _____
Date: _____

B. Storage (\$268.50)**Comments**

1. (a) Are restricted wastes stored in surface impoundments? ☐ Yes ☒ No
- (b) Are containers clearly marked to identify content and date entering storage? ☒ Yes ☐ No
- (c) Are operating records maintained to track the location, quantity and dates of stored restricted wastes? ☒ Yes ☐ No
- (d) Do operating records agree with container labeling? ☒ Yes ☐ No
- (e) Is restricted waste stored for less than 1 year? ☒ Yes ☐ No
- (f) Are tanks emptied at least once per year, or do operating records show that volume of waste removed from tanks annually at least equals tank capacity? ☒ Yes ☐ No
- (g) Is there reason to believe that the wastes are not being stored solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☒ No

C. Treatment in Surface Impoundments (\$268.4)

1. Are F001-F005 restricted wastes treated in surface impoundments? ☐ Yes ☒ No

No surface impoundments

If no, go to D.

2. Did the facility submit a certification of compliance with treatment surface impoundment requirements to the Agency? ☐ Yes ☐ No
3. Have the minimum technology requirements been met? ☐ Yes ☐ No

LAND DISPOSAL RESTRICTIONS

Facility: _____
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- (a) If the minimum technology requirements have not been met, has a waiver been granted for that unit(s)? ☐ Yes ☐ No
4. Have the Subpart F ground-water monitoring requirements been met? ☐ Yes ☐ No
5. Does the operating record include information regarding the volume of liquid flowing through the impoundment or series of impoundments annually? ☐ Yes ☐ No
6. Have the contents of the surface impoundment been tested in accordance with the sampling frequency and analysis specified in the waste analysis plan? ☐ Yes ☐ No
6. Does the operating record indicate that the list and the supernatant have been tested separately? ☐ Yes ☐ No
7. Does the operating record indicate whether the hazardous waste residue exceeds the treatment standards specified in §268.41? ☐ Yes ☐ No
8. Have the hazardous waste residues that exceed the treatment standards (§268.41) been removed on an annual basis? ☐ Yes ☐ No
- (a) If answer to 8 is no and supernatant is determined to exceed BDAT concentrations, is annual throughput greater than impoundment capacity? ☐ Yes ☐ No
9. If residues are removed annually, are adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
10. Provide the frequency of analyses conducted on treatment residues _____
11. When removed, are restricted wastes managed subsequently in another treatment surface impoundment? ☐ Yes ☐ No

Comments

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LAND DISPOSAL RESTRICTIONS

Facility: _____
 ID Number: _____
 Inspector: _____
 Date: _____

12. When removed, are wastes treated prior to disposal?

☐ Yes ☐ No

Comments

(a) If yes, are waste residues treated on or offsite

☐ Onsite ☐ Offsite

(b) List management method _____

D. Treatment

1. Describe treatment processes for restricted wastes.

Spent solvent is recycled

2. Does the facility verify that residuals from all treatment processes for restricted wastes are less than BDAT standards [§268.7(b)(2)]?

☐ Yes ☒ No

3. Describe frequency of testing of treatment residuals.

Every shipment of waste is analyzed

4. Are certifications and results of waste analyses kept in the operating record?

☒ Yes ☐ No

5. Are certifications prepared for each manifested shipment received for treatment and sent offsite for disposal [§268.7(b)(2)(i)]?

☐ Yes ☐ No

E. Land Disposal

1. Does the facility accept restricted wastes that meet or exceed BDAT concentration standards?

☐ Yes ☐ No

If yes, complete (a) through (g) as applicable.

(a) Does facility have an approved waiver based on no migration petition, or are wastes subject to national capacity or site specific capacity extension?

☐ Yes ☐ No

Not a land disposal facility

LAND DISPOSAL RESTRICTIONS

Facility: _____
 ID Number: _____
 Inspector: _____
 Date: _____

- (b) If yes, are records of disposal maintained? ☐ Yes ☐ No
- (c) If national or case-by-case extension and new, replacement, or laterally expanded landfills or impoundments have accepted the "extended" wastes, has the minimum technology checklist inspection been performed? ☐ Yes ☐ No
- (d) Have the minimum technology requirements been met? ☐ Yes ☐ No
- (e) Are certifications of BDAT compliance for wastes maintained in operating record? ☐ Yes ☐ No
- (f) What is the volume of the waste disposed to date? _____
- (g) If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ☐ Yes ☐ No

Comments

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COMMENTS: 10/22/89

CONVERSATION RECORD			TIME 3:00	DATE 3-30-88																
TYPE <input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE			<input checked="" type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING																	
Location of Visit/Conference:																				
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU <i>Stanley Walezynski</i>	ORGANIZATION (Office, dept., bureau, etc.) <i>Environmental manager</i>	TELEPHONE NO. <i>160 605 450 697</i>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: center; padding: 2px;">ROUTING</th> </tr> <tr> <th style="width: 80%; padding: 2px;">NAME/SYMBOL</th> <th style="width: 20%; padding: 2px;">INT</th> </tr> </thead> <tbody> <tr><td style="height: 20px;"></td><td></td></tr> <tr><td style="height: 20px;"></td><td></td></tr> <tr><td style="height: 20px;"></td><td></td></tr> <tr><td style="height: 20px;"></td><td></td></tr> <tr><td style="height: 20px;"></td><td></td></tr> <tr><td style="height: 20px;"></td><td></td></tr> </tbody> </table>		ROUTING		NAME/SYMBOL	INT												
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NAME/SYMBOL	INT																			
SUBJECT <i>Land ban NOV (3-18-88)</i>																				
SUMMARY																				
<i>#1 - Does have some D001 waste</i> <i>Note: I told him that any mixture of a listed H W</i> <i>such as F-solvent and D001 should be manifested</i> <i>by the listed H W I.D. #</i>																				
<i>#2 - prior to the technical correction to the 11-7-86 FR,</i> <i>they had explicit direction from U.S. EPA HQ that</i> <i>their recycled waste was exempt from the</i> <i>land ban regulations. Since they then they have</i> <i>included notices with all applicable shipments as</i> <i>required by 268.7(a)(1)</i>																				
<i>He will send in documentation demonstrating the above</i> <i>- Romero is no longer the environmental manager at this facility</i>																				
ACTION REQUIRED																				
NAME OF PERSON DOCUMENTING CONVERSATION		SIGNATURE		DATE																
<i>Ronald Brown</i>		<i>Ron Brown</i>		<i>3-30-88</i>																
ACTION TAKEN																				
SIGNATURE		TITLE		DATE																